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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Criminal No. CR 06-00190 MHP
Plaintiff,)	
)	
v.)	STIPULATION AND [PROPOSED]
)	ORDER EXCLUDING TIME
)	
ERIC HOSKINS,)	
Defendant.)	

The above-captioned matter came before the Court on May 8, 2006 for status. The defendant was represented by Geoffrey Hansen and the government was represented by William C. Martin, Assistant United States Attorney. Upon the defendant's request to file a motion to suppress in this case, the Court ordered the defendant to file his motion by May 30, 2006. The government was given until June 6, 2006 to file its response. The Court then set June 12, 2006 at 10:00 A.M. for argument on the motion to suppress.

The Court made a finding on the record that the time from and including May 8, 2006 through and including May 30, 2006 should be excluded under the Speedy Trial Act, 18 U.S.C.

**STIPULATION AND [PROPOSED]
ORDER EXCLUDING TIME
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§ 3161(h)(8)(A), because the ends of justice served by taking such action outweighed the best interest of the public and the defendant in a speedy trial. That finding was based on the need for the defendant to have reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and for continuity of counsel pursuant to 18 U.S.C.

§ 3161(h)(8)(B)(iv).

The Court also found that the time from and including May 30, 2006 through and until June 12, 2006 should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(1)(F). That finding was based upon the defendant's request to file a pretrial motion in this case; and the period excluded would include the date of filing of the motion through the conclusion of the hearing on the motion.

The parties hereby agree to and request that this case be set for hearing on the motion on June 12, 2006, and that the exclusion of time until then be granted. The parties agree and stipulate that the additional time is appropriate and necessary under 18 U.S.C. §§ 3161(h)(1)(F) & 3161(h)(8)(A) for all the reasons stated above.

DATED: May 8, 2006

/s/
GEOFFREY HANSEN
Attorney for Defendant

DATED: May 8, 2006

/s/
WILLIAM C. MARTIN
Assistant United States Attorney

So ordered.

DATED: May 11, 2006

MARILYN HALL PATEL
UNITED STATES DISTRICT COURT JUDGE

